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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
In to MANULIFE FINANCIAL CORP. SECURITIES LITIGATION	: Master File No. o. 1:09 CIV 06185-JFK : CLASS ACTION :

STIPULATION AND [PROPOSED] CASE MANAGEMENT ORDER NUMBER 1

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Robbins LLP as Lead Counsel for the class; and

WHEREAS, on November 2, 2009, this Court entered an Order appointing Locals 302 and 612 of the International Union of Operating Engineers-Employers Construction Industry Retirement Trust, Western Washington Laborers-Employers Pension Trust and the California Ironworkers Field Pension Trust as Lead Plaintiff and approving their selection of Coughlin Stoia Geller Rudman &

WHEREAS, the parties have conferred and propose the following schedule for the filling of a consolidated amended complaint and subsequent briefing on Defendants' anticipated motion to dismiss:

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, as follows:

- Lead Plaintiff shall file its consolidated amended complaint on or before December
   2009;
- Defendants shall file their motion to dismiss or otherwise respond to the consolidated
   amended complaint on or before January 29, 2010;
- Lead Plaintiff shall serve any opposition to Defendants' motion to diamiss the consolidated amended complaint on or before March 15, 2010; and
- 4. Defendants shall serve any reply to Lead Plaintiff's opposition to Defendants' motion to dismiss on or before April 15, 2010.

DATED: November 17, 2009

COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP SAMUEL H. RUDMAN DAVID A. ROSENFELD ERIN W. BOARDMAN

DAVID A. ROSENFELD

58 South Service Road, Suite 200 Melville, NY 11747 Telephone: 631/367-7100 631/367-1173 (fax)

Lead Counsel for Plaintiff

DATED: November 12, 2009

DEBEVOISE & PLIMPTON, LLP **EDWIN G. SCHALLERT** GARY W. KUBEK SCOTT N. AUBY

919 Third Avenue

New York, NY 10022 Telephone: 212/909-6000

212/909-6836 (fax)

Attorneys for Defendants

IT IS SO ORDERED.

DATED:

THE HONORABLE JOHN F. KEENAN UNITED STATES DISTRICT JUDGE